

FILED ENTERED
LODGED RECEIVED

JAN 20 2017

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff

v.

GIACOMO SHIM,

Defendant.

NO. 17 CR - 020 RAJ

INFORMATION

The United States Attorney charges:

COUNT 1
(Filing False Tax Return)

On or about March 13, 2012, in the Western District of Washington, GIACOMO SHIM, the president of WS Store Corporation, a Washington company, did willfully make and subscribe the U.S. Corporate Income Tax Return for said company for the year 2011, which was verified by a written declaration that it was made under the penalties of perjury and which GIACOMO SHIM did not believe to be true and correct as to every material matter. That the U.S. Corporate Income Tax Return for WS Store Corporation for the year 2011, which was filed with a proper officer of the United States, stated that

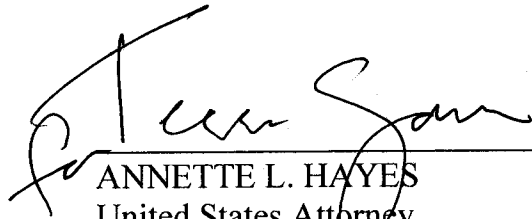
INFORMATION/ SHIM - 1

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

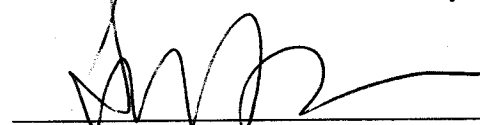
1 the company's gross receipts were \$293,625.00 for the year 2011, whereas, as he then
2 and there knew that the company's gross receipts were approximately \$1,525,388.68.

3
4 All in violation of Title 26, United States Code, Section 7206(1).

5
6 DATED this 19th day of January, 2017.

7
8
9
10 
11 ANNETTE L. HAYES
12 United States Attorney

13 
14 JAMES D. OESTERLE
15 Assistant United States Attorney

16 
17 SEUNGJAE LEE
18 Assistant United States Attorney